

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

John Earl Jones

CHAPTER 13 NO:

22-00638-JAW

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

COMES NOW Debtor, by and through counsel, and files this Response to Trustee's Motion to Dismiss (Dkt#40), and in support thereof states as follows:

1. Debtor filed a petition for relief under chapter 13 of the Bankruptcy Code on March 31, 2022.
2. Debtor has become delinquent in plan payments to the Trustee.
3. Debtor intends to bring the plan payments current prior to the hearing. If Debtor is unable to cure the delinquency, Debtor requests for said delinquency to be paid over the remaining plan term with the Trustee to determine the payment amount. Should there be any delinquency to the continuing mortgage payment, Debtor requests for said amount to be cured over the remaining plan term.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Court will enter its order Trustee's motion and for such other relief to which Debtor may be entitled.

Dated: September 17, 2023

Respectfully submitted,
John Jones

By: /s/ Allison W. Killebrew
Allison W. Killebrew

Prepared by:
G. Adam Sanford, MSB No. 103482
Allison W. Killebrew, MSB No. 102431

McRANEY & McRANEY
P.O. Drawer 1397
Clinton, MS 39060
Phone: (601) 924-5961
Fax: (601) 924-1516
adam@mcraneymcraney.com
allison@mcraneymcraney.com

CERTIFICATE OF SERVICE

I, the undersigned attorney for the Debtor, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Trustee, the United States Trustee, and other parties in interest, if any, as identified below.

Chapter 13 Trustee
David. C. Rawlings

United States Trustee

Dated: September 17, 2023

/s/ Allison W. Killebrew
Allison W. Killebrew

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